

UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States of America)
v.)
Jonathan Daniel TAYLOR) Case No. 5:20-MJ-1828
)
)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 11, 2020 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 758	and did flee or evade a checkpoint operated by the Immigration and Naturalization Service, or any other Federal law enforcement agency, in a motor vehicle and fled Federal, State, or local law enforcement agents in excess of the legal speed limit, a felony,

This criminal complaint is based on these facts:

Continued on Affidavit

Continued on the attached sheet.

/S/Alejandro Miranda

Complainant's signature

Alejandro Miranda Border Patrol Agent
Printed name and title

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed. R. Crim. P. 4.1:

Date: September 14, 2020



Judge's signature

City and state: Laredo, Texas

Christopher Dos Santos U.S. Magistrate Judge
Printed name and title

CONTINUATION OF CRIMINAL COMPLAINT

AFFIDAVIT

In support of Criminal Complaint

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

Jonathan Daniel TAYLOR

Case Number:

1. On September 11, 2020, at approximately 5:41 a.m., a Border Patrol Agent (BPA) working the United States Border Patrol Immigration Checkpoint located at the 29 mile marker (MM) of Interstate Highway 35 (IH-35) near Laredo, Texas in Webb County encountered a white Mercedes Benz SUV with one visible occupant. The inspecting BPA asked the driver, later identified as Jonathan Taylor, if he was by himself and he responded "Yes". During the inspection, a BPA canine handler was performing a non-intrusive inspection of the vehicle using his service canine. The BPA canine handler informed the inspecting BPA to ask for consent to look in the cargo area of the vehicle after his canine alerted to the presence of concealed humans and/or narcotics. Consent was requested by the BPA and Taylor responded "Yeah". Taylor unsuccessfully attempted to open the rear hatch from his driver seat several times. Taylor then told the BPA that he could open it and he stepped out of his vehicle to do so. Taylor opened the rear hatch and immediately attempted to close it. After the BPA canine handler informed Taylor not to close the hatch and that he needed to step away from the rear area and wait until he finish the inspection, Taylor returned to the driver seat, closed the door, and turned on the vehicle.

2. During the inspection, the BPA canine handler observed a subject between the second and third row seats of the vehicle attempting to conceal himself with a blanket. At this moment, the BPA canine handler signaled the inspecting BPA to arrest the driver. The BPA requested Taylor to shut off the engine and exit the vehicle several times. The driver did not follow the instructions and challenged the BPA by asking "Why" to each request. The BPA told Taylor he was being placed under arrest and Taylor asked again "Why". The BPA informed Taylor he was now under arrest. As the BPA was reaching into the vehicle to extract the driver, he sped off with the driver door and rear hatch open to the exit of the checkpoint at a speed faster than the 10 miles per hour (MPH) posted speed limit to flee the checkpoint northbound on IH-35. The driver hit the BPA with the pillar of the vehicle when he fled from the primary inspection. The BPA broadcasted all the information regarding the vehicle using his service radio.

3. A short time later, a Supervisory Border Patrol Agent (SBPA) that was stationary on his marked service unit on the northbound lane on IH-35 near the MM 31 merged onto the highway as the vehicle approached his position. The vehicle passed SBPA's position at a high rate of speed. SBPA estimated the vehicle's speed was over 110 MPH. The posted speed limit on IH-35 after leaving the checkpoint is 75 MPH. The SBPA was unable to catch up to the vehicle nor maintain visual contact. The vehicle was last seen on MM 70 by BPAs assigned to the Cotulla Station.

4. The vehicle was later discovered abandoned by Medina County Sheriff's Deputies near the 124 MM on IH-35 near Devine, Texas in Medina County.

SUBSCRIBED and SWORN to before me on

14th

day of

September, 2020

Signature of Judicial Officer

/S/ Miranda, Alejandro Border Patrol Agent

Signature of Complainant